



Glen  
<Glen@moodydunbar.com>

To: Marta Montoro/DC/USEPA/US@EPA  
cc: "Jerry Munson (E-mail)" <jerry@tabcomp.com>  
Subject: 2003 MeBr CUE Application.xls

03-0017

08/19/2003 07:01 PM

OMB Control # 2060-0482

For EPA Use Only ID # 03-0017

SECTOR

Worksheet 5. Application Summary

This worksheet will be posted on the web to notify the public of requests for critical use exemptions beyond the 2005 phase out for methyl bromide. Therefore, this worksheet cannot be claimed as CBI.

1. Consortium Name: California Pepper Commission

2. Location: California

3. Crop: Pepper

4. Pounds of Methyl Bromide Requested 2005400,000 lbs.

5. Acres Treated with Methyl Bromide 20052500 Acres

6. If methyl bromide is requested for additional years, reason for request:

There are no commercial alternatives that are economically or technically effective in controlling soil borne organisms on about 10% of the state's pepper acreage, of which this application represents.

2006400,000	lbs.	Area Treated	2500	Acres
2007400,000	lbs.	Area Treated	2500	Acres

Place an "X" in the column(s) labeled "Not Technically Feasible" and/or "Not Economically Feasible" where appropriate. Use the "Reasons" column to describe why the potential alternative is not feasible.

Potential Alternatives	Not Technically Feasible	Not Economically Feasible	Reasons
1,3-D	X		Township caps limit use. Not effective against soil borne pathogens, which are the major problems for which MeBr is used on 10% of acreage.
1,3-D + Chloropicrin	X		Concentrations of chloropicrin in 1,3-D/Chloropicrin premixes are not high enough to control diseases when used at maximum label rates.
Chloropicrin	X		Does not distribute throughout soil profile when applied alone, resulting in inadequate efficacy. Does not adequately control Phytophthora when used according to label direction.
Metam Sodium	X		Does not control Phytophthora or wilts. Results are erratic and plants are subject to phytotoxicity.
Metam Sodium/Crop Rotation	X	X	See above. Due to high land costs, there are not many crops that can be rotated with pepper that will provide an economic return. A four or five year rotation is necessary to adequately reduce inoculum in soil.
Solarization/Fungicides	X		Temperatures do not get high enough during land preparation period to control pathogens in soil.

Comments: Application is for 2,500 acres which represents approximately 10% of total production acreage in California. There are no alternatives that provide sufficient control of soil borne pathogens in the coastal regions.

EPA Form # 7620-18a

Pre Plant